

**The Soap and Detergent Association**RECEIVED
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April 11, 2008

Mr. Stephen Johnson
Administrator
U.S. Environmental Protection Agency
Ben Franklin Post Office
P.O. Box 862
Washington, DC 20044

Re: Final Submission under HPV Chemical Challenge Program for Linear and Branched
Alkylbenzene Sulfonic Acids and Derivatives

Dear Administrator Johnson:

I am writing on behalf of The Soap and Detergent Association Linear Alkylbenzene Sulfonate/Alkyl Benzene Sulfonate (LAS-ABS) Consortium.

Attached please find the final revised test plan and assessment with robust study summaries for the Linear and Branched Alkylbenzene Sulfonic Acids and Derivatives High Production Volume (HPV) chemical category under the U.S. EPA's HPV Chemical Challenge Program. This submission contains no confidential business information (CBI). The submission consists of three parts: a cover letter dated April 11, 2008, a final report of the test plan and assessment, and a final set of robust study summaries.

This category includes the six Chemical Abstract Service Registration Numbers (CAS RN) that were part of the initial commitment and the submission to EPA in December 2002:

- 26264-05-1 Benzenesulfonic acid, dodecyl-, compd. with 2-propanamine (1:1)
- 26264-06-2 Benzenesulfonic acid, dodecyl-, calcium salt
- 27323-41-7 Benzenesulfonic acid, dodecyl-, compd. with 2,2',2''-nitrilotris[ethanol] (1:1)
- 68411-32-5 Benzenesulfonic acid, dodecyl-, branched
- 68608-88-8 Benzenesulfonic acid, mono-C11-13-branched alkyl derivs.
- 68953-96-8 Benzenesulfonic acid, mono-C11-13-branched alkyl derivs., calcium salts

In addition, the LAS-ABS Consortium is including in this revised final submission three additional chemicals that it is sponsoring under the Extended HPV Program (eHPV):

- 68608-89-9 Benzenesulfonic acid, mono-C11-13-branched alkyl derivs., sodium salts
- 70528-83-5 Benzenesulfonic acid, dodecyl-, branched, calcium salts
- 90218-35-2 Benzenesulfonic acid, dodecyl-, branched, compd. with 2-propanamine (1:1)

With this submission, the LAS/ABS Consortium believes it has satisfied its commitment for these substances under the EPA HPV Chemical Challenge Program, and is not planning any further submissions for this category at this time.

If you have any questions regarding this submission, you may contact me by telephone at (202) 662-2516 or by e-mail at pdeleo@sdahq.org.

Kind regards,

Paul C. DeLeo, Ph.D.
Director, Environmental Safety

2 Enclosures: Final Revised Test Plan and Assessment with Robust Study Summaries for Linear and Branched Alkylbenzene Sulfonic Acids and Derivatives, Part I: Test Plan and Assessment for LAS/ABS Category
(SDA LAS-ABS category final test plan.pdf)
Part II: Robust Study Summaries for LAS/ABS Category
(SDA LAS-ABS category final robust study summaries.pdf)

By electronic submission (e-mail to johnson.stephen@epa.gov)

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